

**BUREAU OF SECURITY AND INVESTIGATIVE SERVICES
DEPARTMENT OF CONSUMER AFFAIRS**

INITIAL STATEMENT OF REASONS

Hearing Date: No hearing scheduled for this proposed action.

Subject Matter of Proposed Regulations: Exam Application Repeal, Terminology and Training-related Updates

Section(s) Affected: Section 601, 601.1, 621, 628, 636, & 643 of Division 7 of Title 16 of the California Code of Regulations (CCR)¹.

Background and Statement of the Problem:

The Bureau of Security and Investigative Services (Bureau or BSIS) issues licenses, registrations, certificates, and permits to businesses and individuals carrying out activities relating to alarm systems, locks, private investigation, private security, repossession, and firearm and baton training, among other professional duties addressed within the Bureau's practice Acts. There are currently over 433,000 BSIS licenses held by over 350,000 businesses and individuals in California.

The Bureau oversees a total of six practice Acts, including:

- Locksmith Act (Business & Professions Code (BPC) § 6980, et seq.);
- Collateral Recovery Act (BPC § 7500, et seq.);
- Private Investigator Act (BPC § 7512, et seq.);
- Proprietary Security Services Act (BPC § 7574, et seq.);
- Private Security Services Act (BPC § 7580, et seq.); and
- Alarm Company Act (BPC § 7590, et seq.).

The Bureau and Director of Consumer Affairs are authorized to establish necessary rules and regulations for the enforcement of the Acts and the laws subject to its jurisdiction.

Existing California law at CCR 601 and 601.1 mandate that licensees file an application to be eligible for an exam, which were held at least once every two months. The Bureau also regulates advertisements at CCR 621 related to licensee business. Additionally, licensee categories regulated by the BSIS must complete specified training per CCR 628 and 643. For example, proprietary private security officers (PSOs) must complete a course in security officer skills that includes Power to Arrest (PTA) training pursuant to the California Business & Profession Code (BPC) section 7574.18(a) and (b). Alarm agents, security guards, and private investigators must complete a course of training in the carrying and usage of firearms in order to obtain a BSIS firearms permit, pursuant to BPC sections 7583.23, 7596(a), and 7542(a)(1).

¹ Unless otherwise noted, all references to the CCR hereafter are to Title 16.

Effective July 1, 2023, Assembly Bill (AB) 229 (Holden, Chapter 697, Statutes of 2021) and AB 2515 (Holden, Chapter 287, Statutes of 2022), require the Bureau to expand PTA training to include appropriate use of force topics for applicants and licensees. In 2023, the Bureau updated PTA training requirements, but there are still requirements in regulation that are no longer current practice of the Bureau (application for exams) as well as terminology that is not consistent with updated statute. Additionally, the Bureau has received public inquiries seeking additional insight and clarification on licensing requirements.

This proposal updates the application for examination process, and repeals the time requirements for examinations to be consistent with current business practice. This proposal broadens what the Bureau considers an advertisement. This proposal aligns regulatory language with updated statutory terminology for consistency and clarity. This proposal repeals CCR 636, course approval related to firearms, because it is no longer necessary as CCR 635 mandates a course outline for firearms training instructors.

This proposal also clarifies that 16 hours of elective courses for security personnel shall be completed within 6 months of initial registration or date of employment. It also clarifies/adds elective courses to be consistent with the most recent version of the “Power to Arrest and Appropriate Use of Force Training Manual” dated January 2025.² The proposal would also make other minor, technical non-substantive changes to cross-references to address consistency with statutory authority.

This proposal is necessary to help ensure Bureau licensees have additional code references outlining their training requirements and licensing terms. Ensuring licensees have the proper resources to remain compliant is the Bureau’s highest priority of consumer safety and protection.

Anticipated benefits from this regulatory action:

This action benefits the health and safety of California consumers by clarifying the licensing requirements for security personnel to help ensure that they meet training standards implemented by the Bureau, which has the primary mission of public protection.

Specific purpose of, and rationale for, each adoption, amendment, or repeal:

Article 1. General Provisions

Section 601, Application for Examination, Division 7

Purpose: This proposal amends section 601 to become consistent with current business practice.

Rationale: BPC 7501.6 states “The director may establish and enforce such rules and regulations as may be reasonable and necessary for the examination and licensing of applicants, for the conduct of licensees, and for the general

² This manual is exempt from the Administrative Procedures Act per BPC 7583.7 and 7585.

enforcement of various provisions of this chapter in the protection of the public.” Also, BPC 7582.6 states, “An application for a license under this chapter shall be on a form prescribed by the director and accompanied by the application fee provided by this chapter.”

It is necessary to add “, to the Bureau, via mail at its current physical address listed on its website or through the Bureau's online portal accessible through the Bureau's website.” for applicants to be aware of acceptable means by which the Bureau accepts applications for examinations.

Deleting “Complete applications must be filed in person at or mailed to the Bureau's Sacramento office no later than 20 days prior to the next scheduled or requested examination date. An applicant who fails to file within the above time period may, at the Bureau's discretion, be scheduled to take the following scheduled examination.” is necessary due to examinations being administered by a third-party vendor and not being proctored by Bureau staff. BSIS has partnered with Psychological Services Industries (PSI) to administer examinations on behalf of the Bureau. After the Bureau approves an application, PSI receives an applicants’ contact information such as name and address, and applicants schedule an examination with PSI.

It is necessary to add “An applicant who fulfills the above requirements shall receive guidance from the Bureau via mail or electronically on how to proceed scheduling their examination. If an applicant does not complete all requirements, the Bureau shall mail or email the applicant a deficiency or denial letter.” So that applicants are aware of how they may be contacted or notified regarding the exam process.

Section 601.1, Time and Place of Examinations, Division 7

Purpose: This proposal repeals section 601.1 to become consistent with current business practice.

Rationale: This repeal is necessary for the same reasons listed above in CCR section 601.

Section 621, Advertisement, Division 7

Purpose: This proposal amends section 621 (a) subsection (1) to include internet based or electronically transmitted communication as an additional method of advertisement.

Rationale: These amendments are necessary to include technological advances that were previously not methods of advertisement for the Bureau to properly monitor in the interest of consumer protection.

Article 6

Amend the Title of Article 6. Private Security Services, Alarm Company

Operators, Guards, Patrolperson, Alarm Agents (Installer/Responder) of the California Code of Regulations, to read as follows:

Article 6. Private Security Services Act, Alarm Company Act, Proprietary Security Services Act

Purpose & Rationale: It is necessary to update the article title to be consistent with current statutory terminology.

Section 625, Definitions, Division 7

Purpose: This proposal adds section 625 (c) to include the definition of security personnel.

Rationale: CCR 643 (a) states “The attached Appendix sets forth the subjects that shall be taught and the minimum number of hours that shall be allowed towards meeting required training. For the purposes of this section, “security personnel” means a security guard or a proprietary private security officer.” The amendment to 628 is necessary to provide additional clarification for private security guards and proprietary private security and use terminology consistent with that known and used by licensees and those directly affected by the practice act/regulations.

Section 628 (a), Training in Exercising the Powers to Arrest Appropriate Use of Force, Division 7

Purpose: This proposal amends section 628 (a) to strikethrough private investigators and add proprietary private security services to become consistent with training requirements prescribed in CCR 643.

Rationale: BPC 7574.18(a) states “Except for a person who has completed the course of training required by Section 7583.45, a person registered and hired as a proprietary private security officer shall complete training in security officer skills within six months from the date upon which registration is issued, or within six months of their employment with a proprietary private security employer.” The Bureau added Section 7583.6(a) amendments made within Senate Bill 652 to include all security personnel. These amendments are necessary to make training requirements consistent with relevant Bureau statutes and also clear to Bureau licensees required to complete the powers to arrest course training.

Section 628 (b), Training in Exercising the Powers to Arrest Appropriate Use of Force, Division 7

Purpose: This proposal amends section 628 (b) to update terminology, be consistent with current training timeframe requirements, and update the reference to the Training Manual date.

Rationale: Specifying “security personnel” rather than employees of private patrol operators is necessary because this terminology includes both proprietary

private security officers (PSOs) and security guards (SGs). If this amendment is not made, utilizing the term “employees of private patrol operators” will only include SGs and will exclude PSOs.

BPC 7583.23(b)(1) states “a bureau-certified firearms training instructor has certified that the applicant has successfully completed a written examination prepared by the bureau and training course in the carrying and use of firearms approved by the bureau within the six months preceding the date the application is submitted to the bureau.” These amendments are necessary for consistency with training requirements set forth in BPC 7583.23 (b)(1) and BPC 7574.18(a). Updating the date of the Manual is necessary for consistency with the latest version.

Section 628 (c), Training in Exercising the Powers to Arrest Appropriate Use of Force, Division 7 of the CCR

Purpose: This proposal amends section 628 (c) to clarify which licensees are permitted to administer, train, and certify the Bureau’s security personnel training course, and update the reference to the Training Manual date.

Rationale: BPC 7583.6(f) states “The trainings specified in this section may be administered, tested, and certified by one of the following:” and BPC 7583.6(f)(1) states “any licensee.” These amendments are necessary to clarify which Bureau licensees and approved entities are permitted to teach our security personnel training course. Despite this section being housed within the Private Patrol Operators subsection of Chapter 11.5, the Bureau receives regulatory clarification inquiries. By adding Private Patrol Operators to 628(c), this will provide clarification on training requirements and which licensees are permitted to instruct this training course. Updating the date of the Manual is necessary for consistency with the latest version.

Section 628 (d), Training in Exercising the Powers to Arrest Appropriate Use of Force, Division 7 of the CCR

Purpose: This proposal adds section 628 (d) to become consistent with training requirements prescribed in Senate Bill 652.

Rationale: It is necessary to have a statement so that the Bureau can verify that the applicant completed proper training, which helps ensure the Bureau adequately provides consumer safety and protection.

Repeal Section 636, Course Approval, Division 7 of the CCR

Purpose: This proposal repeals section 636 to become consistent with current business practice.

Rationale: Within CCR 635, the Bureau provides a firearms training outline and has an approved training manual published on the BSIS website. CCR 636 is no longer necessary because firearms training instructors are mandated to instruct

the Bureau-approved course outlined within CCR 635. Ensuring all applicants have completed the training in the carrying and usage of firearms will help ensure the Bureau adequately provides consumer safety and protection.

Article 9

Amend the Title of Article 9. Skills Training Course for Security Guards, to Skills Training Course for Security Personnel

Purpose & Rationale: It is necessary to update the article title to be consistent with current statutory terminology.

Section 643(a)

Add: or “security officer”

Purpose & Rationale: It is necessary to include this term for consistency with current statutory terminology and for clarity, as it is commonly used by those affected by the Bureau’s regulations.

Section 643 Appendix I (A), Skills Training Course for Security Guards and Proprietary Private Security Officers, Division 7 of the CCR

Purpose: This proposal amends section I (A) Power to Arrest to amend the Power to Arrest and Appropriate Use of Force Training Manual publication date.

Rationale: Updating the date of the Manual is necessary for consistency with the latest version.

Section 643 Appendix II, Skills Training Course for Security Guards and Proprietary Private Security Officers, Division 7 of the CCR

Purpose: This proposal amends section II Mandatory Outline of Courses to provide clarification to the course completion timeframe, proprietary private security code section reference, and which licensees must complete this course requirement.

Rationale: CCR 643 (a) states “the attached Appendix sets forth the subjects that shall be taught and the minimum number of hours that shall be allowed towards meeting required training. For the purposes of this section, ‘security personnel’ means a security guard or a proprietary private security officer.” These amendments are necessary so that those impacted clearly understand the requirements for completing all aspects of the security personnel training outline. The Bureau is removing “card” from this section for consistency with language in BPC 7583.6.

Section 643 Appendix III, Skills Training Course for Security Guards and Proprietary Private Security Officers, Division 7 of the CCR

Purpose: This proposal amends section III Elective Course Outlines to replace “guard” with the term “security personnel”, add a course complete timeframe requirement, and expand on additional elective course topics that are permitted to be taught.

Rationale: Prior to the revisions made within AB 229, the Bureau required security guards to complete a Weapons of Mass Destruction training course. This course manual is still available on the Bureau’s website and can be offered as an elective course. The Bureau would like to also provide additional elective course options based on topics mentioned within our Power to Arrest and Appropriate Use of Force Training Manual and received inquiries by licensed employees. Due to frequent training requirement and licensee restriction inquiries, the Bureau proposes to add a Proprietary Private Security Services section for applicants seeking to solely provide propriety private security services. Training instructors are encouraged to discuss the difference in training requirements, job functions, and uniform requirements. Electronic Control Device is an elective to offer applicants more in-depth insight as to which devices are permitted, those prohibited, and safety concerns. Restraint techniques is a proposed elective for training instructors to expand on our new use of force content to discuss use of control holds and safety concerns.

Update Authority cited and Reference

Rationale: Updating to the correct statute is necessary for accurate references.

Underlying Data

- A. April 17, 2025, Bureau Advisory Committee meeting minutes, Agenda Item 7
- B. August 21, 2025, Bureau Advisory Committee meeting minutes, Agenda Item 9
- C. Senate Bill 652

Business Impact:

The regulation does not have an economic impact, the impact is not anticipated to be a significant statewide adverse economic impact directly affecting businesses, including the ability to compete with other businesses in California, because the proposed revisions within this package will expand on current training requirements and definitions set forth within the practice acts.

Economic Impact Assessment:

This action benefits California consumers because provide clarity to all Bureau licensees as to what is required, and which security personnel courses may be taught.

- It will not result in the creation of new jobs or elimination of jobs within the State of California because the proposed amendments are anticipated to have minimal impact on businesses by providing additional training

requirement clarification.

- It will not result in the creation of new businesses or elimination of businesses within the state of California because the proposed amendments are anticipated to have minimal impact on businesses by providing additional training requirement clarification.
- It will not affect the expansion of businesses currently doing business within the State of California because the proposed amendments are anticipated to have minimal impact on businesses because the revisions made within this package will revise current security personnel training courses and expand on the definition of advertisement.
- It will benefit the consumer protection of California residents because the proposal will provide transparency as to what requirements are in place for Bureau licensees.
- This regulatory proposal does not affect worker safety or the environment because the proposed regulations are not relative to workers' safety or the environment.

Specific Technologies or Equipment:

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives:

The Bureau has initially determined that no reasonable alternative to the regulatory proposal would be more effective in carrying out the purpose for which the regulation is proposed, would be as effective and less burdensome to affected applicants than the adopted regulation, or would be more cost effective to affected applicants and equally effective in implementing the statutory policy or other provision of law.

Description of reasonable alternatives to the regulation that would lessen any adverse impact on small business:

No such alternatives have been proposed, however, the Bureau welcomes comments from the public.